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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 JEFFREY PATTERSON,
17 Defendant.

18 Case No. 2:21-mj-00640-NJK

19 **STIPULATION TO CONTINUE
20 PRELIMINARY HEARING
(Second Request)**

21 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
22 Acting United States Attorney, and K. Nicholas Portz, Assistant United States Attorney,
23 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
24 and Joanne L. Diamond, Assistant Federal Public Defender, counsel for Jeffrey Patterson, that
the Preliminary Hearing currently scheduled on May 18, 2022 at 4:00 p.m., be vacated and
continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

25 This Stipulation is entered into for the following reasons:

26 1. The parties require additional time to discuss the potential for a Pre-Indictment
negotiation.

1 2. Counsel for the defendant will require additional time to review and investigate
2 discovery and meet with the client to discuss the details prior to proceeding.

3 3. Defendant is incarcerated and does not object to a continuance.

4 4. The parties agree to the continuance.

5 5. Additionally, denial of this request for continuance could result in a
6 miscarriage of justice.

7 6. Additionally, denial of this request for continuance could result in a miscarriage
8 of justice. The additional time requested by this Stipulation is excludable in computing the time
9 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
10 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
11 Section 3161(h)(7)(B)(i), (iv).

12 This is the second request for continuance filed herein.

13 DATED this 3rd day of May, 2022.

15 RENE L. VALLADARES
16 Federal Public Defender

17 By /s/ Joanne L. Diamond

18 JOANNE L. DIAMOND
Assistant Federal Public Defender

15 CHRISTOPHER CHIOU
16 Acting United States Attorney

17 By /s/ K. Nicholas Portz

18 K. NICHOLAS PORTZ
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JEFFREY PATTERSON,
Defendant.

Case No. 2:21-mj-00640-NJK

ORDER

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
May 18, 2022 at the hour of 4:00 p.m., be vacated and continued to June 21, 2022, at
4:00 p.m.

DATED this 3rd day of May, 2022.

UNITED STATES MAGISTRATE JUDGE